

Mr. William Fox
Fleetwood Travel Trailers of Indiana, Inc.
P. O. Box 665
Crawfordsville, Indiana 47933

Re: 107-11448-00045
First Significant Permit Modification to
Part 70 Permit 107-7928-00045

Dear Mr. Fox:

Fleetwood Travel Trailers of Indiana, Inc., located at 1635 Elmore Street, Crawfordsville, Indiana was issued a Part 70 permit on July 12, 1999 for a stationary travel trailers manufacturing operation. A petition for administrative review and a request of stay of effectiveness to the Part 70 permit has been received by IDEM, OAM on July 21, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification is made to address the source's issues. The modification is as follows:

Issues Raised in the Petition	IDEM, OAM Responses
Section D.1, emission unit EU-1, identified as chassis fabrication paint booth, has been removed from the plant, and it should be deleted in the Part 70 permit.	The entire Section D.1, which referenced emission unit EU-1, has been deleted in the Part 70 permit.

<p>Section D.3, emission unit EU-3, is identified as uncontrolled VOC emissions from hand application processes. These hand application processes all occur within the main manufacturing building.</p> <p>Operation condition D.3.1 limits the VOC PTE from emission unit EU-3 to 24 tons per year in order to avoid the applicability of 326 IAC 8-1-6 (General Reduction Requirements). The source's main manufacturing building (emission unit EU-3) was built in August 1971 (documentation attached), which predates the applicability date of rule 326 IAC 8-1-6. Therefore, 326 IAC 8-1-6 should not have been applied and VOC PTE limit of 24 tons per year should be deleted.</p> <p>Specify a VOC emission limitation of 250 tons per year to avoid the PSD applicability.</p>	<p>Operation condition D.3.1, which limits the VOC PTE from emission unit EU-3 to 24 tons per year, and all the operation conditions for this facility are deleted in the Part 70 Permit, because:</p> <p>326 IAC 8-1-6 (General Reduction Requirements) is not applicable since EU-3 construction date of August 1971, predates the rule applicability of January 1, 1980</p> <p>326 IAC 8-6-1 (Organic Emissions Limitations) is not applicable either, since EU-3 construction date of August 1971, predates the rule applicability of after October 7, 1974 and prior January 1, 1980.</p> <p>A VOC emission limitation of less than 250 tons per year to avoid the PSD applicability, is not necessary, since the source's VOC emission is less than 250 tons per year, and also predates the PSD rule applicability of 1977.</p>
<p>Section D.2:</p> <p>In a previous discussion with IDEM, we stressed our concern over a strict production capacity limit of 4 units per hour. While IDEM explained that the limit was not enforceable, they agreed to limit the production to a maximum capacity of 96 units per day, with an average 4 units per hour. This statement was incorporated into Section A.2.2. It was not incorporated into the Facility Description [326 IAC 2-7-5(15)] of Section D.2. The source seeks consistency with these two descriptions.</p>	<p>Facility Description in Section D.2 is revised to be consistent with the description in A.2.2</p>
<p>The Record Keeping Requirements in condition D.3.5(a) specifies that records for items (1) through (6) shall be taken daily.</p>	<p>The word "daily" in D.3.5(a) is changed to "monthly", since there is no condition for the facility in this section that limits its emissions daily.</p>

Upon further review, OAM decided to remove the HAP Reporting Form on Page 42 of 43 of the issued Part 70 permit, since there is no operation condition in the permit that limits the HAPs emissions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

Fleetwood Travel Trailers of Indiana, Inc.
Crawfordsville, Indiana
Part 70 Permit Reviewer: Jay Patterson
Modification Reviewer: Aida De Guzman

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1st Significant Permit Modification 107-11448-00045

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0
and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

APD

cc: File - Montgomery County
U.S. EPA, Region V
Montgomery County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Fleetwood Travel Trailers of IN, Inc.
1635 Elmore Street
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-7928-00045	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 12, 1999
1 st Significant Permit Modification No.: 107-11448-00045	
Issued by: Paul Dubenetzky, Chief Permit Branch	Issuance Date: Pages Affected: 28, 29, 30, 31, 33, 42

SECTION D.1

FACILITY OPERATION CONDITIONS

This section which consists of pages 28 of 43 through 30 of 43 has been deleted, since the facility in this section has been removed from the plant.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (2) One (1) adhesive spray booth, identified as spray booth EU-2, utilizing HVLP spray equipment, with a maximum capacity of 96 units per day with an average of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to CP 107-3252-00045, issued on June 13, 1994, the particulate matter (PM) overspray from the spray booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3**FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC2-7-5(15)]

- (3) Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesive and cleaning solvents exhausted to source ventilation and identified as EU-3.

There are no requirements applicable to this facility.

Fleetwood Travel Trailers of IN, Inc.
Crawfordsville, Indiana
Permit Reviewer: Jay Patterson
Modification Reviewer: Aida De Guzman

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1st Significant Permit Modification 107-11448-00045

This page for the Part 70 Quarterly Report on HAPs has been deleted.

**Indiana Department of Environmental Management
Office of Air Management**

Technical Support Document (TSD) for a Significant Permit Modification

Source Background and Description

Source Name:	Fleetwood Travel Trailers of Indiana, Inc.
Source Location:	1635 Elmore Street, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	3792
Operation Permit No.:	T 107-7928-00045
Operation Permit Issuance Date:	July 12, 1999
Significant Permit Modification No.:	107-11448-00045
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a Petition for Administrative Review and a request of stay of effectiveness from Fleetwood Travel Trailers of Indiana, Inc. relating to specific issues of the issued Part 70 permit.

History

On July 21, 1999, Fleetwood Travel Trailers of Indiana, Inc. submitted a Petition for Administrative Review and a request of stay of effectiveness to the Part 70 permit (T 107-7928-00045), issued on July 12, 1999.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

The following are the issues raised by the source in the petition:

Issues Raised in the Petition	IDEM, OAM Responses
Section D.1, emission unit EU-1, identified as chassis fabrication paint booth, has been removed from the plant, and it should be deleted in the Part 70 permit.	The entire Section D.1, which referenced emission unit EU-1, has been deleted in the Part 70 permit.

<p>Section D.3, emission unit EU-3, is identified as uncontrolled VOC emissions from hand application processes. These hand application processes all occur within the main manufacturing building.</p> <p>Operation condition D.3.1 limits the VOC PTE from emission unit EU-3 to 24 tons per year in order to avoid the applicability of 326 IAC 8-1-6 (General Reduction Requirements). The source's main manufacturing building (emission unit EU-3) was built in August 1971 (documentation attached), which predates the applicability date of rule 326 IAC 8-1-6. Therefore, 326 IAC 8-1-6 should not have been applied and VOC PTE limit of 24 tons per year should be deleted.</p> <p>Specify a VOC emission limitation of 250 tons per year to avoid the PSD applicability.</p>	<p>Operation condition D.3.1, which limits the VOC PTE from emission unit EU-3 to 24 tons per year, and all the operation conditions for this facility are deleted in the Part 70 Permit, because:</p> <p>326 IAC 8-1-6 (General Reduction Requirements) is not applicable since EU-3 construction date of August 1971, predates the rule applicability of January 1, 1980.</p> <p>326 IAC 8-6-1 (Organic Emissions Limitations) is not applicable either, since EU-3 construction date of August 1971, predates the rule applicability of after October 7, 1974 and prior January 1, 1980.</p> <p>A VOC emission limitation of less than 250 tons per year to avoid the PSD applicability, is not necessary, since the source's VOC emission is less than 250 tons per year, and it also predates the PSD rule applicability date of 1977.</p>
<p>Section D.2:</p> <p>In a previous discussion with IDEM, we stressed our concern over a strict production capacity limit of 4 units per hour. While IDEM explained that the limit was not enforceable, they agreed to limit the production to a maximum capacity of 96 units per day, with an average 4 units per hour. This statement was incorporated into Section A.2.2. It was not incorporated into the Facility Description [326 IAC 2-7-5(15)] of Section D.2. The source seeks consistency with these two descriptions.</p>	<p>Facility Description in Section D.2 is revised to be consistent with the description in A.2.2</p>
<p>The Record Keeping Requirements in condition D.3.5(a) specifies that records for items (1) through (6) shall be taken daily.</p>	<p>The word "daily" in D.3.5(a) is changed to "monthly", since there is no condition for the facility in this section that limits its emissions daily.</p>

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	No new PTE will result from this modification.
PM-10	
SO ₂	
VOC	
CO	
NO _x	

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for Modification

The Title V permit is being modified through a Significant Permit Modification under 326 IAC 2-7-12(d). Pursuant to this rule, any significant change in existing monitoring terms or conditions and every relaxation of a reporting or record keeping term or condition will be a significant modification.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

This modification does not change the federal rules determination made in the issued Part 70 permit.

State Rule Applicability - Entire Source

This modification does not change the state rules determination made in the issued Part 70 permit.

State Rule Applicability - Individual Facilities

This modification does not change the state rules for individual facilities determination made in the issued Part 70 permit except for the following:

- (a) 326 IAC 8-1-6 (General Reduction Requirements):

Emission unit EU-3 was determined in the Part 70 permit to be subject to 326 IAC 8-1-6, because its VOC potential emissions are greater than 25 tons per year.

This emission unit EU-3, although the VOC emissions are greater than 25 tons per year is not subject to 326 IAC 8-1-6, because its construction date of August 1971, predates the rule applicability of January 1, 1980.

- (b) 326 IAC 8-6-1 (Organic Emissions Limitations) is not applicable either, since EU-3 construction date of August 1971, predates the rule applicability of after October 7, 1974 and prior January 1, 1980.
- (c) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
The chassis fabrication paint booth, EU-1 was determined to be subject to 326 IAC 8-2-9.
This rule no longer applies, because emission unit EU-1 has been removed from the plant.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements determined in the issued Part 70 permit shall stay the same except for the deletion of the following (changes are bolded and struck-through for emphasis):

1. The spray booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to show compliance with 326 IAC 6-3-2.

~~2. The chassis fabrication painting operation has applicable monitoring conditions as specified below:~~

~~(a) Record keeping of information sufficient to show that VOC emissions are not discharged in excess of 3.5 lb/gal of coating, excluding water.~~

~~These monitoring conditions are necessary to show compliance with 326 IAC 8-2-9.~~

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

The air toxic determination made in the Part 70 permit is not affected by this Significant Permit Modification.

Conclusion

The operation of this travel trailer manufacturing operation shall be subject to the conditions of the attached **Significant Permit Modification T107-11448-00045**.